

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

LA Chemical, Ltd.  
Attn: Dave Ryniec  
138 Factory Road  
Addison, Illinois 60101

Application No.: 90080017  
Applicant's Designation:  
Subject: Repackaging Operation  
Date Issued: January 18, 2002  
Location: 138 Factory Road, Addison

I.D. No.: 043005ALD  
Date Received: December 17, 2001  
Expiration Date: July 18, 2006

Permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of ten 10,000-gallon underground storage tanks with submerged loading pipe, one mixing tank, two repackaging lines, an activated carbon filter system to control the DMEA tank filling process, and a soil vapor extraction system as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/yr of volatile organic material). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit(s) issued for this location.
- 2a. Operation of equipment shall not exceed the throughput limits described in Attachment A.
- b. Compliance with annual limits shall be determined from a running total of 12 months of data.
- 3a. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

- b. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
4. The Permittee shall maintain monthly and annual records of the following:
  - a. Solvent production from tanks, by group, in gal/mo and gal/yr.
  - b. Solvent production from drums, by group, in gal/mo and gal/yr.
  - c. Emissions of volatile organic material and non volatile organic material, by group, in ton/mo and ton/yr.
  - d. Emissions of HAPs, by group, in ton/mo and ton/yr.
5. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
6. If there is an exceedance of the requirements of this permit as determined by the record required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences. This report should be sent to:
7. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

8. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: usage rates of solvents and emission rates of hazardous air pollutants and volatile organic material. If there have been no exceedances during the prior calendar year, the Annual Emission Report shall include a statement to that effect.

It should be noted that this permit has been revised to include the operation of the carbon filter system for the DMEA tank filling process with no increase in emissions of VOM.

If you have any questions on this, please call Tara T. Nguyen-Ede at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 1  
Illinois EPA, FOS - CMU  
Lotus Notes

### Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the repackaging plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

1. Emissions from the repackaging operation:

Throughput (K Gal/Mo)(K Gal/Yr)		Emissions Unit	Maximum Emission Rate (Lb/1000 Gal)	Non-VOM Emissions (Tons/Mo) (Tons/Yr)	
		<u>Group A</u>			
20	240	Tanks	9.760	0.10	1.17
15	180	Drums	14.640	0.11	1.32
		Totals:		0.21	2.49
Throughput (K Gal/Mo)(K Gal/Yr)		Emissions Unit	Maximum Emission Rate (Lb/1000 Gal)	VOM Emissions (Tons/Mo) (Tons/Yr)	
		<u>Group B</u>			
20	240	Tanks	4.880	0.05	0.59
15	180	Drums	7.320	0.06	0.66
		<u>Group C</u>			
200	2,400	Tanks	3.660	0.37	4.4
100	1,200	Drums	5.490	0.28	3.3
		<u>Group D</u>			
125	1,500	Tanks	2.440	0.16	1.83
75	900	Drums	3.660	0.14	1.65
		<u>Group E</u>			
100	1,200	Tanks	1.220	0.061	0.74
50	600	Drums	1.830	0.046	0.55
		<u>Group F</u>			
600	7,200	Tanks	0.732	0.22	2.64
300	3,600	Drums	1.098	0.17	1.98
		<u>Group G</u>			
250	3,000	Tanks	0.244	0.031	0.37
130	1,560	Drums	0.366	0.024	0.29
		<u>Group H</u>			
250	3,000	Tanks	0.024	0.0031	0.037
175	2,100	Drums	0.037	0.0032	0.039
		Total:		1.62	19.08

2. VOM Emissions from the soil vapor extraction: 0.06 TPM and 0.72 TPY.

These limits define the potential emissions of the repackaging operation and the soil vapor extraction system and is based on the actual emissions determined from unit capacity, emission standards if applicable, and standard emission factors. The tanks include underground storage tanks, tanker trucks, mix tanks, totes, and other vessels with 55-gallon drums without submerged loading pipes. Compliance with annual limits shall be determined from a running total of 12 months of data.

3. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

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